

March 17, 2022

From: Donald Thrasher

To: Office of the General Counsel, Kentucky Registry of Election Finance

Re: Request For Advisory Opinion

Ms. Saunders,

I would respectfully request the Kentucky Registry of Election Finance (hereinafter "KREF") provide an advisory opinion on the following campaign related questions if possible:

First, may a KY registered "Permanent Action Committee" charge candidates for advertising in a newspaper published by the "Permanent Action Committee"?

Second, if a Permanent Action Committee publishes a newspaper but the articles do not contain any language that expressly advocates for the election or defeat of a candidate, but has one page of "endorsements" by the Permanent Action Committee do the candidates endorsed have to report that as an in-kind contribution?

Third, in the above scenario if the Permanent Action Committee on one of the pages of the newspaper has an "endorsements page" with 8 candidates and one of those candidates is an officer of the Permanent Action Committee would the Permanent Action Committee officer (candidate) have to report an in-kind contribution and if so how would the value of that contribution be determined?

Fourth, The Permanent Action Committee officer's campaign did not contribute to the Permanent Action Committee – but in his capacity as a Permanent Action Committee Officer did work on the newspaper, would this change any reporting requirement?

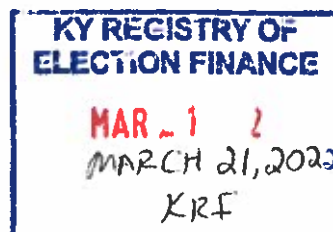
The Permanent Action Committee is the Nelson County America First PAC and I am a candidate for Nelson County Judge Executive as a Republican in the May 17th, 2022 primary.

Thank you very much for considering the aforementioned questions and providing an advisory opinion if possible.

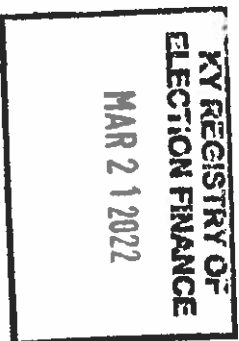
Respectfully Submitted,



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